

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**In the Matter of**

**Commercial Mobile Radio Service  
Market Competition**

**To: Wireless Telecommunications Bureau**

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**WT Docket No. 06-17**

**COMMENTS**

RSA 1 Limited Partnership, dba Cellular 29 Plus, and Iowa RSA 2 Limited Partnership, dba Lyrix Wireless, ("Filer") submit these Comments in response to a Public Notice released by the Wireless Telecommunications Bureau ("Bureau") to solicit data and information to evaluate the state of competition among Commercial Mobile Radio Service ("CMRS") providers.<sup>1</sup> The Bureau invited comments to allow it to update the indicators of competition for the Commission's next report to Congress and to determine whether or not there is effective competition in the CMRS market.

Filer is a small CMRS provider that serves the following rural market area(s) Adams, Fremont, Mills, Montgomery, Page, Taylor, Union, Clarke, Lucas, Ringgold, Decatur and Wayne counties in southwest and south central Iowa. These counties are considered the licensed area.

Filer is a member of the Rural Cellular Association ("RCA") and was encouraged by RCA to submit comments in this matter. RCA is a frequent commenter in various Commission proceedings and recommended that its members provide information that could be helpful to the Bureau in understanding the state of mobile voice and data competition, and trends, in rural areas.

Cellular 29 Plus and Lyrix Wireless are small, rural wireless providers which have been in existence for approximately 14 years. Attached you will find a map showing the coverage area. The licensed area was referenced in one of the above paragraphs. Service is not limited to major highways and is available for local residents who travel throughout the area. Mobile Data Service will be offered in the next sixty days.

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<sup>1</sup> Public Notice, *WTB Seeks Comment on CMRS Market Competition*, DA 06-62, released January 18, 2006.

-2-

Although a rural population is not able to compete with an urban one, the filer has seen a steady growth in its customer base which relates to the increasing popularity of mobile phones. Local Number Portability has also had a positive impact.

However, there are tangible concerns with pricing trends when comparing small and large carriers. The larger carriers are definitely able to offer more enticing plans, features, and promotional offers for mobile phones. It is an extremely aggressive market which demands the smaller carrier be ever vigilant and creative in devising promotions and strategies to stay in competition with the larger carriers.

In closing, small and rural carriers offer much a needed service and coverage to customers in areas where their larger counterparts normally do not. Because these rural carriers are dealing with much smaller subscriber numbers, due diligence and consideration should be given when imposing new, costly unfunded mandates.

Respectfully submitted,

RSA 1 Limited Partnership  
dba Cellular 29 Plus

Iowa RSA 2 Limited Partnership  
dba Lyrix Wireless



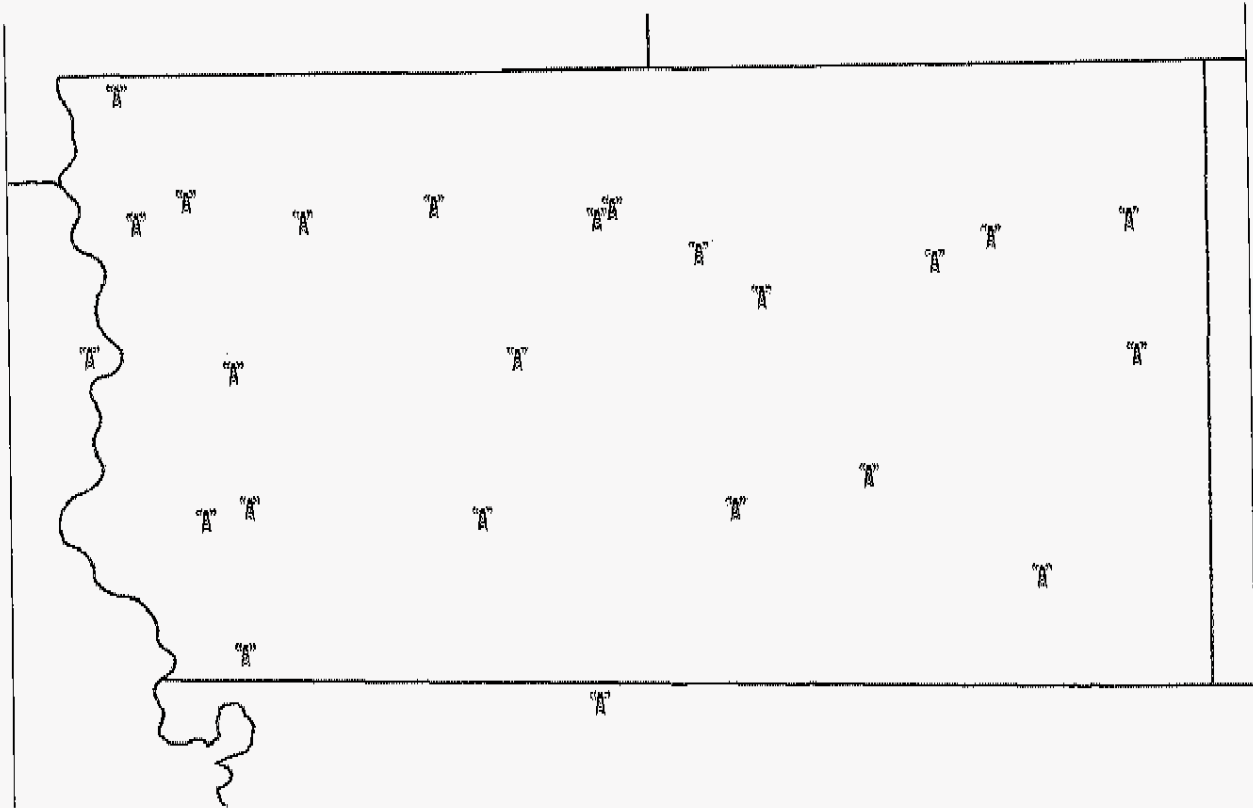
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Date: February 17, 2006

-3-

## Coverage Map for Cellular 29 Plus

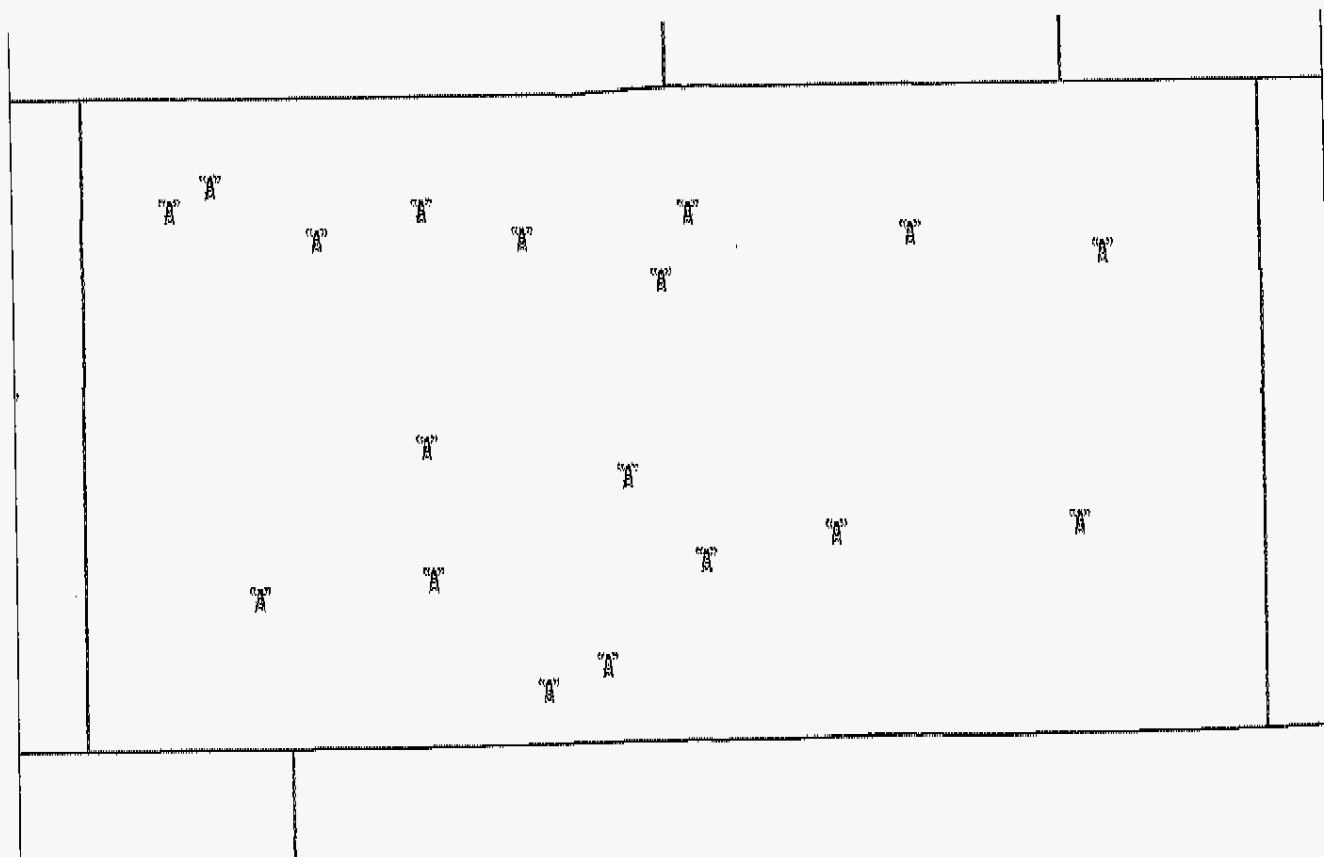


Mills, Montgomery, Page,

Taylor, Fremont, and Adams Counties

-4-

## Coverage Map for Lyrrix Wireless



Union, Clarke, Lucas,

Ringgold, Decatur, and Wayne Counties